

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MELINDA BROWN and TREFFLE
LAFLECHE,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP,
INC. and NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURGH, PENNSYLVANIA,

Defendants.

C. A. No. 04-10685 GAO

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

EXHIBIT 4



Daniel J. Kelly
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Tel: 617 345 7026
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February 6, 2004

VIA OVERNIGHT MAIL

National Union Fire Insurance Company of Pittsburgh, PA
175 Water Street
New York, NY 10038

Re: Treffle LaFleche and Melinda Brown; D&O Liability Policy Claim --
Tender of Defense

Dear Sir or Madam:

The undersigned represents Treffle LaFleche and Melinda Brown ("Insureds"), two former directors of the Lexington, Kentucky-based company Computrex, Inc., now the subject of a bankruptcy proceeding in the United States Bankruptcy Court for the Eastern District of Kentucky, Lexington ("Court"), Case No. 01-53755. On Friday, January 30, 2004, the Insureds were served with a 63-page Adversary Complaint filed by the Bankruptcy Trustee in the Bankruptcy Proceeding, together with an Order for Pretrial Conference and Order for Trial. A copy of the Complaint, Summons, and Court Orders are enclosed herewith. The Order for Trial sets out a trial date of May 26, 2004, a mere three months from now.

The claims raised against the Insureds are covered by a Directors, Officers and Private Company Liability Insurance Policy issued by National Union Fire Insurance Company of Pittsburgh, PA ("National Union"), Policy No. 72-35-08 and Run-Off Endorsement (the "Policy"). A copy of the Policy is also enclosed hereinwith. Accordingly, pursuant to Paragraphs 7 and 8 of the Policy, the Insureds, by this letter and its enclosures, hereby provides notice to National Union of the claims against the Insured in the Complaint by the Bankruptcy Trustee (the "Claims"). Moreover, the Insureds, by this letter, tender the defense of the Claims to National Union, and respectfully demand that National Union assume the defense of the Claims by taking immediate and appropriate actions, including the appointment of counsel. As the enclosed Court Orders indicate, this matter has been put on an accelerated schedule and time is of the essence.

The Insureds request that their existing counsel, Gadsby Hannah LLP, be appointed counsel to defend them in this action. The Insureds are residents of Massachusetts and have longstanding ties to Gadsby Hannah. Moreover, lawyers from Gadsby Hannah represented the Insureds in depositions taken by the Bankruptcy Trustee in late 2002 and early 2003 pursuant to Rule 2004 of the

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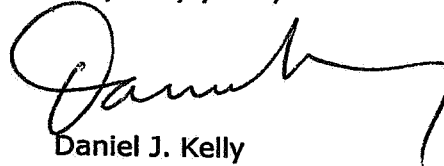
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GADSBY HANNAH LLP

Bankruptcy Rules of Procedure. As a result of the depositions and recent meetings with the insureds, Gadsby Hannah attorneys are familiar with the allegations and claims raised in the Complaint and are in the best position to defend the Claims, given the accelerated schedule dictated by the Court..

Upon receipt of this letter, please contact the undersigned as soon as possible with instructions as to how to proceed.

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel J. Kelly", with a long horizontal flourish extending to the right.

Daniel J. Kelly

DJK:tm
Enclosures